

1 my questioning there is any -- you have any  
2 misunderstanding or you don't understand certain things  
3 that I'm asking you, ask me to repeat it and I'll be glad  
4 to do so, okay?

5 A. Yes.

6 Q. If for any occasion you wish to go off the  
7 record, let me know and I will ask Miss Grill to go off  
8 the record and we will accommodate you.

9 A. Very good.

10 Q. Are there any questions regarding how we're  
11 going to proceed?

12 A. No.

13 Q. Okay. Would you state your full name for the  
14 record, Mr. Prather?

15 A. Ross Clayton Prather.

16 Q. And your -- And would you state your  
17 professional background for the record?

18 A. I'm an attorney.

19 Q. And you practice in Pennsylvania?

20 A. Yes.

21 Q. Okay. And you currently serve on the school  
22 board?

23 A. Correct.

24 Q. When were you first elected to the school  
25 board?



1 A. I was elected in 2001.

2 Q. Okay. Did you serve in any elected position  
3 prior to the school board?

4 A. No.

5 Q. Okay. And your educational background?

6 A. I have a Bachelor's of Arts from the College of  
7 Wooster. I have a JD from Drake University Law School,  
8 and I have a Master's of Arts in teaching from Brown  
9 University.

10 Q. Are you aware of the lawsuit that's filed by  
11 Miss Wagner?

12 A. Yes.

13 Q. When did you first become aware of that?

14 A. Sometime in the last year or two.

15 Q. And it was in your capacity as a member of the  
16 board that it came to your attention?

17 A. Yes.

18 Q. I see. And did -- Having the knowledge of the  
19 lawsuit, has that -- have you done -- have you done -- is  
20 that -- has that changed your life in any way as a member  
21 of the board?

22 MR. KUHAR: I object to the question.

23 Changed his life in any way as a member of the board  
24 is not relevant. It doesn't seek to lead to  
25 relevant information. It probably is litigation

1 A. By --

2 Q. The demographics shown there?

3 A. Now in the paragraph that I read there are no  
4 demographics. The paragraph above it indicates 300 out of  
5 which -- 307 students are of African decent out of 4,300.

6 I'm certainly not troubled by a number -- I mean  
7 that's just a percentage of how many African American are  
8 in the Crawford County School District.

9 I mean the number is what it is. I don't think  
10 there's any value associated to that particular number.  
11 That's Meadville's demographics and Meadville and  
12 Cochranton's demographics.

13 Are you referring to some other number?

14 Q. No, that number in that article. That article,  
15 what do you --

16 A. I want to make sure I'm reading the same thing  
17 that you're asking.

18 Q. Yeah, the number --

19 A. It says that out of 4,300 kids in Crawford  
20 Central 307 are of African decent.

21 Q. Yes.

22 A. I mean, is your question whether I think we  
23 should have more African decent children or less?

24 Q. Well, in the context of the article he writes,  
25 do you agree with him, disagree with him, what he's saying

1 about the --

2 A. I think that --

3 Q. -- About the racial composition of the teaching  
4 staff and in the school district?

5 A. I'm not exactly sure what his point is from the  
6 one paragraph that I've read. He starts out by saying, on  
7 principle he's against --

8 Q. And do --

9 MR. KUHAR: He's trying to answer.

10 A. On principle he's against affirmative action.

11 So I disagree with him there, I'm for affirmative action.

12 If his point is that Crawford Central is not doing  
13 what it can to recruit, hire and retain minority  
14 applicants, then I simply agree, that's a meritorious  
15 position, but I disagree with his conclusion that we're  
16 not doing enough. And I don't know if he really knows  
17 what we've done. I don't know, Mr. DiAngi.

18 Q. So you're saying you think the school district  
19 is doing enough? You're satisfied with the school  
20 district in this regard?

21 A. From what I know of the school district's  
22 efforts to recruit -- I'll use his words, hire and retain  
23 --

24 Q. Right.

25 A. -- Minority applicants, from what I know, we

1 are taking substantial steps.

2 Q. Okay. As a member of the board can you  
3 articulate specific -- what you're doing or have done?

4 A. I can tell you that the board has discussed it,  
5 the board has indicated that we would like to see more  
6 applicants, we would like to see more teachers and  
7 administrators and staff who are of -- of a minority  
8 background.

9 And I can only speak for myself, I'm satisfied that  
10 the administration that we have spoken to is listening and  
11 doing what they can. It's a -- It's a challenge. It's a  
12 challenging request that we've made to them.

13 Q. Did you ever receive from Mrs. Wagner -- Have  
14 you, regarding her efforts to obtain a full-time teaching  
15 position (indicating)?

16 A. Have I ever seen correspondence?

17 Q. Yeah, received letters.

18 A. I think I received two letters indicating that  
19 she would like to be considered for some positions at  
20 Crawford Central. I think they were mailed directly to me  
21 from Miss Wagner.

22 Q. You have --

23 A. That's not my only knowledge on the subject,  
24 but that's the most recent thing that's come to my  
25 attention.

1 I'll ask, if a substitute teacher teaches for four years,  
2 and two years it's 90 percent of the time, and has a batch  
3 of good evaluations, positive evaluations from those of  
4 whom she has substituted, and other otherwise certified  
5 and qualified, do you find it strange then that while she  
6 continuously applies for full-time positions, she's  
7 continuously rejected and rebuffed? Do you find that  
8 strange?

9 A. I don't think our school board has ever placed  
10 an objective test on hiring. A person doesn't have to  
11 just sit in a category for a certain number of years. The  
12 school board has always taken the position that the  
13 administration will determine whether or not the person is  
14 qualified for the position, and if so, then the person  
15 most qualified for the position within the rules and  
16 policies will receive the position.

17 Q. Do you, as a member of the board -- You, as a  
18 member of the board, oversee the implementation of the --  
19 of the compliance -- of the district's compliance with the  
20 civil rights laws?

21 A. It depends on what you mean by oversee.

22 Q. I mean are you involved in -- I mean supervise  
23 or oversee or whichever word you choose. I think I make  
24 myself clear.

25 Does the board set and simply except what the --

1 what it's told by the administrative staff, or does it  
2 call the staff out and say, look, I'm going to -- I want  
3 to review the employment records, I want to see the EEO  
4 submissions to the EEOC. I want to see how many  
5 minorities have been hired over the past five, 10 years.

6 Is it pro-active or -- I'm talking about from the  
7 vantage point of the board now.

8 A. Uh-huh.

9 Q. Are they pro-active in overseeing, supervising  
10 or do you just simply rubber stamp?

11 A. I don't think we rubber stamp anything. There  
12 certainly has been discussion, which I've indicated  
13 already, that we are concerned about more hiring and  
14 gathering more applicants, and we're doing what we can do  
15 there.

16 With regard to specifics, I'm not exactly sure what  
17 you're referring to as far as our -- the board's role. I  
18 think that the board is pro-active in its --

19 Q. But is it --

20 A. Let me finish. I think the board is pro-active  
21 in its instruction that we comply with the spirit of all  
22 civil rights laws.

23 Q. That's the very issue. You put your finger on  
24 it. Is -- What is the board's role in terms of  
25 compliance? Because I have interviewed today two --

1           Q.    As it relates to hiring in this school  
2           district.

3           A.    Okay.  As I indicated, the board is pro-active  
4           and concerned with regard to the hiring of minorities.  In  
5           fact, we would like to have more minorities as teachers,  
6           as administrators and as staff at Crawford Central.

7           I personally have talked to Charley Heller and was  
8           very satisfied with the responses that I received from  
9           Charley Heller on this particular point.

10          As far as the board's role in overseeing this, the  
11          board's role is this:  The Civil Rights Act is a huge and  
12          very involved and complex piece of legislation.  We do not  
13          get involved in every aspect of it.

14          However, I think that this board is quite  
15          appropriately involved in its indication to the  
16          administration that we require that the letter and spirit  
17          of the civil rights laws be met with regard to hiring and  
18          with regard to every other aspect of the civil rights  
19          laws.

20          Q.    Mr. Prather, you have addressed my concern to  
21          this extent.  You have said -- You have talked -- the  
22          board discuss these issues, that's correct.  And you said  
23          that --

24          A.    Yes.

25          Q.    And these issues, the board has discussed.  My